

No 28,257 Equity

HOWARD A. RUBENSTEIN and
MITCHELL STEVAN, Trustees
440 Tower Building
Baltimore, Maryland 21202

* IN THE
* CIRCUIT COURT

vs.

LENOX LAND CORPORATION,
a body corporate (charter annulled 4/18/73)
By service upon:
Ronald C. Creamer, Howard M. Friedel
and Howard B. Miller, Directors
10 Light Street
Baltimore, Maryland 21202

* FOR
* FREDERICK COUNTY

* * * * *

PETITION TO FORECLOSE DEED OF TRUST

TO THE HONORABLE, THE JUDGE OF SAID COURT:

Howard A. Rubenstein and Mitchell Stevan, Trustees,
respectfully represent:

1. That on September 2, 1969, the Defendant executed and delivered to Jack C. Merriman and Ronald C. Creamer, Trustees, a deed of trust upon certain fee simple property in Frederick County, therein described, to secure the payment of the deed of trust debt of \$1,272,000.00 and interest as therein set forth; wherein the Defendant assented to the passage of a decree for the sale of the said property to take place at any time after any default in any covenant or condition of said deed of trust; as more particularly set forth in the true copy of the deed of trust attached as a part hereof marked "Trustees' Exhibit No. 1".

2. That by a deed of appointment dated June 28, 1978, Howard A. Rubenstein and Mitchell Stevan were appointed as Trustees in the place and stead of the said Merriman and Creamer; a true copy of the deed of appointment is attached as a part hereof marked "Trustees' Exhibit No. 2".

3. That the said Defendant is in default despite written notice of default given by the Trustees and the failure of the Defendant to cure the same despite the expiration of more than thirty days